

MAF/ 27 January 2017

Referring to your letter Ares(2016) 6601248 (24/11/2016) Finnish Ministry of Agriculture and Forestry hereby reports on progress achieved in the implementation of Landing Obligation (LO) according to Regulation (EU) 2015/812 (Omnibus) amending Regulation (EU) 1380/2013 (Article 15.14).

1) Steps taken by Finland and producer organisations to comply with the LO;

Finnish fishing vessels in the Baltic Sea fish for herring, sprat, salmon and cod are the ones affected by the new provisions as from 1st January 2015.

Finland participated in the preparatory work for the discard plan in the framework of BALTFISH. During 2014-2015 Finland has participated actively in many meetings organized by the DG Mare, EFCA and BALTFISH fisheries control group. The BALTFISH control working group elaborated an explanatory note on the different rules for fishermen (leaflet) in December 2014. This leaflet was submitted to the fishermen organizations in Finland and to the fishing industry just before 1st January 2015. Finland has no producer organisations.

2) Steps taken by Finland regarding control of compliance with the LO;

The BALTFISH control working group and EFCA has organized meetings during 2015 and 2016 regarding control of compliance with the LO. The discussions on different interpretations, control scenarios, risk analysis and cases that are specific to the Baltic Sea region have been very fruitful. Finland has used this material to give instructions and information to the inspectors how to comply with the new rules of the LO.

The log-books have been amended by adding BMS -code to the coastal -log-book.

Non-compliance of landing obligation rules is considered as a serious infringement of the Common Fisheries policy (CR 1224/2009, Article 90 1. c). So far no infringements have been detected concerning non-compliance with the LO provisions. This is in harmony with the information from ICES that discards in the pelagic fisheries are negligible. Cod fisheries and landings to Finnish ports are very scarce. Discards in salmon fisheries are also assumed to be non-existent since salmon individuals caught with trapnets are large adult fish and since undersized or predator (seal) damaged salmon can be returned to sea and are not covered by the LO (Article 15.4(d) in 1380/2013).

3) Information on the socioeconomic impact of the LO;

We see a very low socioeconomic impact of the LO for Finnish fisheries (See the explanations concerning each fishery).

4) Information on the effect of the LO on safety on board fishing vessels;

We also see no effect of the LO on safety on board by Finnish vessels as unwanted by-catches are limited to cod fisheries which are at a very low level.

5) Information on the use and outlets of catches below the MCRS of a species subject to the LO; la

As the landings of catches below the MCRS are very small, there is no information on the use or outlets of catches below the MCRS.

6) Information on port infrastructures and of vessels' fitting with regard to the LO;

As the landings below the MCRS are minimal, there has not been any need for reconstructing port or vessel infrastructures.

7) For each fishery concerned, information on the difficulties encountered in the implementation of the LO and recommendations to address them.

Pelagic fishery is very clean fishery of herring and sprat with very small amounts of unwanted by-catches. For pelagic species there are no MCRS's in the Baltic Sea. All the pelagic catches can be used effectively, partly for human purposes and the rest for fodder (for animal food) and fishmeal purposes. There is no reason for fishermen to discard pelagic catches at sea and therefore the LO -rules have not caused difficulties for these vessels.

Salmon fishery is carried out mainly with traps and fyke-nets. These gear-types are under the derogation with the possibility to release undersized salmon and discard predator (seal) damaged fish. Finnish salmon long-line fishery in the Baltic sea main basin has been closed since 2013.

Cod fishery: Only two Finnish trawlers have participated in cod fishery in the southern part of the Baltic Sea during 2015-2016. There have been few landings by these two vessels to Swedish, Danish and Polish ports (20 tons in 2016 and 285 tons in 2015). Only one landing in 2015 comprised MCRS - fish (350 kg). Landings of cod to Finnish ports were very scarce as well. There were 4 gillnetters fishing for cod in south-west of the Åland Islands landing 36 tons in 2016 (7 tons in 2015).

These figures indicate that the Finnish operators have no difficulties in complying with the LO. That is also reason why we have not financed any projects by the European Maritime and Fisheries Fund or other sources of funding on discards -issue or adaptation to the implementation of the landing obligation.